

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE PERIOD TO AMENDED COMPLAINT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendants Connie Berg, Kyle Berg, the Connie Berg Revocable Living Trust, and the Kyle R. Berg Revocable Living Trust (collectively, the “Berg Defendants”), and the Court issued a Summons, on August 26, 2024. *Docs. 1 and 2.* Answers to the Adversary Complaint were due by September 25, 2024. *Doc. 2.*

Plaintiff filed an Amended Complaint on September 25, 2024, triggering a new response time for the Berg Defendants. *Doc. 11.*

2. The Berg Defendants have requested an in-person settlement meeting with Plaintiff, and Plaintiff is willing to participate in such meeting. Accordingly, the parties have scheduled the meeting for October 24, 2024.

3. To facilitate such meeting, the Berg Defendants have requested that their deadline to file an answer or other response to the Amended Complaint be extended to November 22, 2024. Plaintiff does not oppose such extension request.

4. Accordingly, the Berg Defendants and Plaintiff hereby move the Court, by stipulation, for an order extending the deadline for the Berg Defendants to file an answer or other response to the Amended Complaint to November 22, 2024.

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Dated: October 9, 2024

/e/ Peter D. Kieselbach

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Dated: October 9, 2024

/s/ Stephen M. Pezanosky

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